Case 2:16-cv-00377-SMJ ECF No. 56 filed 11/03/17 PageID.576 Page 1 of 3 1 Honorable Salvador Mendoza, Jr. 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF WASHINGTON 9 AT SPOKANE 10 11 TYLER JAMES THOMAS 12 Case No. 2:16-cy-00377-SMJ LANKFORD, 13 Plaintiff, **DECLARATION OF RACHELLE** 14 STEFANSKI IN SUPPORT OF 15 PLAINTIFF'S MOTION FOR VS. **PARTIAL SUMMARY** 16 CITY OF PULLMAN; COUNTY OF **JUDGMENT** 17 WHITMAN; STATE OF 18 WASHINGTON; OFFICER JOSHUA BRAY; OFFICER ALEX GORDON; 19 DETECTIVE TODD DOW; OFFICER 20 GREG UMBRIGHT; OFFICER JUSTIN) 21 DEROSIER; OFFICER MIKE PETLOVANY; OFFICER BRIAN 22 CHAMBERLAIN; SERGEANT SAM 23 SOREM; and DOES I-X, 24 25 Defendants. 26 27 I, Rachelle Stefanski, declare: 28 I am a Legal Assistant for the Civil Rights Justice Center, PLLC, 1. 29 30 which is counsel of record herein for plaintiff Tyler James Thomas Lankford. Civil Rights Justice Center PLLC DECLARATION OF RACHELLE STEFANSKI IN SUPPORT OF 2150 North 107th Street, Suite 520 PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT Seattle, Washington 98133 (206) 577-7719 / Fax: (206) 659-0183

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- 2. On approximately August 3, 2016, I contacted the Quality Inn Paradise Creek in Pullman, Washington, via telephone, to inquire how to obtain the registration information of a guest.
 - I spoke with the manager, Rebeca Ward. 3.
- Ms. Ward asked for the guest information and dates, which I provided 4. as Tyler Lankford and dates of July 25, 2015 through July 28, 2015.
- She also asked for my email address and informed me that she would 5. forward the registration information to me via email.
- 6. On August 3, 2016, I received an email from gm, wa015@choicehotels.com, with the requested registration information, which also included payment information for the room. A true and correct copy of that email and registration document is attached to this declaration as Exhibit "A," and is incorporated by reference herein.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Seattle, Washington on the 3^{vd} day of November, 2017.

Rachelle Stefanski

Civil Rights Justice Center PLLC

DECLARATION OF RACHELLE STEFANSKI IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

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CERTIFICATE OF SERVICE

I, Rachelle Stefanski, under penalty of perjury under the laws of the State of Washington, declare as follows:

I am a resident of the State of Washington, over eighteen years of age, and not a party to the within action. I hereby certify that on November 3, 2017, I electronically filed the foregoing DECLARATION OF RACHELLE STEFANSKI IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT and this CERTIFICATE OF SERVICE with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record.

Executed on November 3, 2017, at Seattle, Washington.

Rachelle Stefanski, Legal Assistant